

MEMO ENDORSED

## HENNIGAN, BENNETT &amp; DORMAN LLP

LAWYERS  
 865 SOUTH FIGUEROA STREET  
 SUITE 2800  
 LOS ANGELES, CALIFORNIA 90017  
 TELEPHONE (213) 694-1200  
 FACSIMILE (213) 694-1234

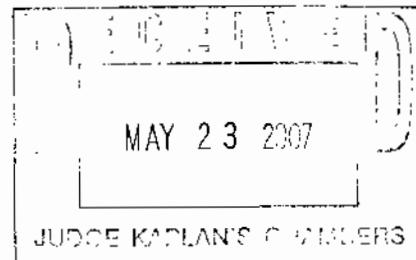
DIRECT PHONE (213) 694-1159  
 CHOCKA@HBDLAWYERS.COM

USDS SDNY  
 DOCUMENT  
**ELECTRONICALLY FILED**  
 DOC #: \_\_\_\_\_  
 DATE FILED: 5/24/07

May 22, 2007

## VIA HAND DELIVERY

Honorable Lewis A. Kaplan  
 United States District Judge  
 United States District Court  
 for the Southern District of New York  
 United States Courthouse  
 500 Pearl Street  
 New York, NY 10007



**Re: *John Hancock Life Insurance Co., et al. v. Bank of America Corp., et al.,***  
**Case No. 07-CV-03790 (In re Parmalat Secs. Litigation, 04-MD-1653 (LAK))**

Dear Judge Kaplan:

We represent plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and John Hancock Insurance Company of Vermont (together, "Hancock") in the above-referenced matter. On January 7, 2007, Hancock filed its complaint against certain Bank of America entities in the U.S District Court for the District of Massachusetts; on May 15, 2007, Your Honor accepted Hancock's action as a matter related to the *Parmalat* MDL proceeding.

As we represent a number of other plaintiff groups in the consolidated action, we understand that the discovery period for the other cases in the MDL proceeding has already closed. In order to expedite the discovery process in the *Hancock* action, however, we have been working closely with defendants' counsel to expedite the process. Document production by Hancock and by the defendants is nearly complete, and defendants have already noticed the depositions of three Hancock employees who were involved with plaintiffs' *Parmalat*-related investments. Accordingly, we request that that Court add Hancock to the Stipulated Protective Order so that we may have immediate access to the documents, transcripts and other materials produced in the consolidated proceedings.

SO ORDERED

LEWIS A. KAPLAN, USDC 5/24/07

HENNIGAN, BENNETT & DORMAN LLP

Honorable Lewis A. Kaplan  
May 22, 2007  
Page 2

We are available to discuss this matter at Your Honor's convenience.

Sincerely,



Allison Chock

AC/cy

cc: All Counsel of Record (by email)